

JASON M. FRIERSON  
United States Attorney  
District of Nevada  
Nevada Bar No. 7709

STEPHEN R. HANSON II  
Assistant United States Attorney  
501 Las Vegas Blvd. So., Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
Stephen.Hanson@usdoj.gov

*Attorneys for the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Omar Qazi

Plaintiff,

v.

United States of America, Department of  
Justice, Bureau of Prisons, State of Nevada,  
Department of Corrections, Does 1 through 20,  
inclusive.

Defendants.

Case No. 2:23-cv-00052-RFB-VCF

**Stipulation to Extend Defendants'  
Answering Deadline**

**(First Request)**

Plaintiff Omar Qazi, Defendant United States of America, Department of Justice, Bureau of Prisons ("United States"), and Defendant State of Nevada, Department of Corrections ("State of Nevada") stipulate that the Defendants' deadline to answer or otherwise respond to Plaintiff's complaint will be March 6, 2023, which is 60 days after the United States removed this action to federal court. The purpose of the stipulation is to allow the United States and the State of Nevada adequate time to investigate this case before answering or otherwise responding to the complaint. In addition, the parties request a response date that applies to both the United States and State of Nevada so that the responses are not staggered. This is the parties' first stipulation to extend time for the Defendants to answer or otherwise respond to the complaint.

///

///

1 The parties further stipulate that if the Defendants file motions to dismiss this case, Plaintiff  
2 shall have until April 17, 2023, to respond to such motions so that Plaintiff will have adequate  
3 time to research the legal issues and because Plaintiff's counsel has a trial scheduled for the end of  
4 March that may interfere with responding to such motions.

5 IT IS SO STIPULATED.

6  
7 Dated: February 9, 2023

Dated: February 9, 2023

8 MICHAEL P. BALABAN  
9 Law Offices of Michael P. Balaban

JASON M. FRIERSON  
United States Attorney

10 /s/ Michael P. Balaban  
11 Michael P. Balaban  
12 Attorney for Plaintiff

/s/ Stephen R. Hanson II  
Stephen R. Hanson II  
Assistant United States Attorney

13  
14 Dated: February 9, 2023

15 NEVADA ATTORNEY  
16 GENERAL'S OFFICE

17 /s/ Douglas Rands  
18 Douglas Rands  
19 Deputy Nevada Attorney General

20  
21 IT IS SO ORDERED:

22  
23   
24 \_\_\_\_\_  
United States Magistrate Judge

25 Dated: 2-9-2023  
26 \_\_\_\_\_  
27  
28

**Certificate of Service**

I hereby certify that on February 9, 2023, I electronically filed and served the foregoing Stipulation to Extend Defendants' Answering Deadline with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system, as well as served a copy via first class, regular mail as follows:

Nevada Attorney General's Office  
Douglas Rands  
Deputy Attorney General  
100 N. Carson Street  
Carson, NV 89701